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8 **UNITED STATES BANKRUPTCY COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

10

In re

Case No. 2:20-bk-21022-BR

11

GIRARDI KEESE

Chapter 7

12

Debtor.

13 **NOTICE OF MOTION AND MOTION FOR**  
14 **ORDER REQUIRING EXAMINATION**  
15 **AND PRODUCTION OF DOCUMENTS**  
16 **BY ULLMAN ACCOUNTANCY CORP.**  
17 **AND MICHAEL J. ULLMAN PURSUANT**  
18 **TO RULE 2004 OF THE FEDERAL**  
19 **RULES OF BANKRUPTCY**  
20 **PROCEDURE; MEMORANDUM OF**  
21 **POINTS AND AUTHORITIES;**  
22 **DECLARATION OF RONALD**  
23 **RICHARDS IN SUPPORT THEREOF**

24 DATE:

25 TIME: [No Hearing Required]

26 PLACE:

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2 **TO THE HONORABLE BARRY RUSSELL, UNITED STATES BANKRUPTCY JUDGE,**  
3 **THE DEBTOR, ULLMAN ACCOUNTANCY CORP AND MICHAEL J. ULLMAN, AND**  
4 **OTHER INTERESTED PARTIES:**

5                   **PLEASE TAKE NOTICE** that, pursuant to this "Notice of Motion and Motion  
6 for Order Requiring Production of Documents Pursuant to Rule 2004 of the Federal Rules  
7 of Bankruptcy Procedure; Memorandum of Points and Authorities; Declaration of Ronald  
8 Richards in Support Thereof" (the "Motion"), Elissa D. Miller (the "Trustee"), the duly  
9 appointed, qualified, and acting chapter 7 trustee for the estate of the debtor Girardi  
10 Keese (the "Debtor"), respectfully requests, pursuant to Rule 2004 of the Federal Rules  
11 of Bankruptcy Procedure and Local Bankruptcy Rule 2004-1, an order directing ULLMAN  
12 ACCOUNTANCY CORP AND MICHAEL J. ULLMAN collectively ("Ullman") to produce  
13 the documents identified in Exhibit "A" attached hereto (the "Requested Documents") by  
14 no later than July 21, 2021, and that Ullman appear for examination, under oath, and that  
15 such examination take place on July 23, 2021, at 1:00 p.m., Pacific Time.

16                   **PLEASE TAKE FURTHER NOTICE** that, in light of anticipated continuation  
17 of office closures related to the COVID-19 pandemic, the Trustee requests that the  
18 documents be produced electronically by email to [ron@ronaldrichards.com](mailto:ron@ronaldrichards.com) and  
19 [morani@ronaldrichards.com](mailto:morani@ronaldrichards.com).

20                   **PLEASE TAKE FURTHER NOTICE** that, in light of anticipated continuation  
21 of office closures related to the COVID-19 pandemic, the examination shall take place via  
22 "zoom.com" and the instructions for the zoom meeting shall be provided to Ullman no  
23 later than July 21, 2021.

24                   **PLEASE TAKE FURTHER NOTICE** that this Motion is brought in  
25 accordance with Rule 2004 of the Federal Rules of Bankruptcy Procedure and Local  
26 Bankruptcy Rule 2004-1, in light of the fact that no adversary proceeding is pending in  
27 which Ullman is a party, and is made on the grounds that the examination is necessary  
28 for the Trustee to ascertain and discover assets of the estate including, without limitation,

1 possible avoidance power claims against, among others, Erika Girardi aka Erika Jayne  
2 aka Erika Chahoy and her affiliated entities. Due to the limited scope of this Motion, the  
3 Trustee anticipates that further document production(s) and examination(s) may be  
4 necessary.

5 **PLEASE TAKE FURTHER NOTICE** that this Motion is based on the  
6 attached memorandum of points and authorities, the attached exhibits, and the file in this  
7 case, of which the Court is requested to take judicial notice.

8 **PLEASE TAKE FURTHER NOTICE** that, unless otherwise ordered by the  
9 Court, this Motion will be ruled on without a hearing pursuant to Local Bankruptcy Rule  
10 9013-1(p).

11 **PLEASE TAKE FURTHER NOTICE** that, since Ullman is not the debtor,  
12 the Trustee also will be issuing a subpoena pursuant to Rule 9016 of the Federal Rules  
13 of Bankruptcy Procedure and Rule 45 of the Federal Rules of Civil Procedure, which will  
14 be served after the order granting the Motion is entered.

15 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Bankruptcy  
16 Rule 2004-1(f), the party whose examination is requested may file a motion for protective  
17 order if grounds exist under Rule 7026 of the Federal Rules of Bankruptcy Procedure and  
18 Rule 26(c) of the Federal Rules of Civil Procedure. A motion for protective order must be  
19 filed and served not less than fourteen (14) days before the date of the examination, and  
20 set for hearing not less than two (2) days before the scheduled examination, unless an  
21 order setting hearing on shortened notice is granted by the court pursuant to Local  
22 Bankruptcy Rule 9075-1. The parties may stipulate, or the court may order, that the  
23 examination be postponed so that the motion for protective order can be heard on regular  
24 notice under Local Bankruptcy Rule 9013-1.

25 **WHEREFORE**, the Trustee respectfully requests that the Court enter an  
26 order:

27 1. granting the Motion;

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1                   2.     directing ULLMAN ACCOUNTANCY CORP and Michael J. Ullman to  
2 produce the documents identified in Exhibit "A" by no later than 5:00 p.m. on July 21,  
3 2021, and that such documents be produced electronically by email to  
4 ron@ronaldrichards.com and morani@ronaldrichards.com;

5                   3.     directing ULLMAN ACCOUNTANCY CORP and Michael J. Ullman to  
6 appear for examination, under oath, on July 23, 2021, at 1:00 p.m., Pacific Time, with the  
7 examination to take place via "zoom.com";

8                   4.     retaining jurisdiction to consider any additional request for  
9 information and documents on appropriate notice; and

10                  5.     granting such other and further relief as this Court deems just and  
11 proper under the circumstances.

12 DATED: June 23, 2021

Law Offices of Ronald Richards & Associates, APC

14                  By: /s/ Ronald Richards  
15                   Ronald Richards  
16                   Special Litigation Counsel for Elissa D. Miller,  
17                   Chapter 7 Trustee

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## **MEMORANDUM OF POINTS AND AUTHORITIES**

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## **PREFATORY STATEMENT**

4 In order to uncover the whereabouts of potential assets of the estate,  
5 including the location of millions of dollars of litigation settlement proceeds or other firm  
6 assets which may have been fraudulently transferred to Erika Girardi aka Erika Jayne  
7 aka Erika Chahoy and her affiliated entities (collectively, "Erika"), the Trustee must  
8 examine witnesses who may have first-hand knowledge of this widespread fraud.  
9 ULLMAN ACCOUNTANCY CORP and Michael J. Ullman, who are Erika's accountants  
10 and business managers, are one such witnesses. Because the Motion's aim is to  
11 uncover potential recipients of fraudulently transferred monies, and will aid the Trustee in  
12 fulfilling her fiduciary duties to creditors by enabling her to access key financial  
13 information relative to the Debtor's business operations and potential avoidance actions,  
14 the Motion must be granted.

11

## RELEVANT BACKGROUND

17 Girardi Keese (the “Debtor”) was, before its downfall, a highly regarded  
18 plaintiff’s law firm based in Los Angeles, California. As the layers of the onion began to  
19 be peeled back, it was discovered that a wide-spread fraud had been perpetrated, to the  
20 detriment of scores of litigants who placed their trust in the Debtor and its widely-known  
21 founder, Thomas Girardi (“Girardi”). As a result of the unearthed information, on  
22 December 18, 2020, petitioning creditors Jill O’Callahan, as successor in interest to  
23 James O’Callahan, Robert M. Keese, John Abassian, Erika Saldana, Virginia Antonio,  
24 and Kimberly Archie (collectively, the “Petitioning Creditors”) filed an involuntary chapter  
25 7 bankruptcy petition against the Debtor.<sup>1</sup>

<sup>27</sup> <sup>1</sup> The Petitioning Creditors also filed an involuntary chapter 7 bankruptcy petition against Thomas V. Girardi, which is currently pending as Case No. 2:20-bk-21020-BR.

1                   On December 24, 2020, the Petitioning Creditors filed a “Motion for  
2 Appointment of Interim Trustee Pursuant to 11 U.S.C. § 303(g)” (the “Interim Trustee  
3 Motion”) [Docket No. 12]. The Court entered an order granting the Interim Trustee  
4 Motion on January 5, 2021 [Docket No. 45] and, on January 6, 2021, the Trustee was  
5 appointed as the interim trustee. On January 13, 2021, the Court entered its “Order  
6 Directing: (1) The Clerk of Court to Immediately Enter an Order for Relief Under Chapter  
7 7; (2) the United States Trustee to Immediately Appoint a Chapter 7 Trustee; (3) the  
8 Debtor to File All Schedules and Related Documentation for Chapter 7 Case Within  
9 Fourteen Days of the Entry of This Order; and (4) Vacating February 16, 2021 Status  
10 Conference” [Docket No. 68]. The same day, the Clerk of Court entered an order for  
11 relief against the Debtor, and the Trustee was subsequently appointed and accepted her  
12 appointment in the Debtor’s case.

13                   The Trustee is six months into her administration of the estate, and is  
14 beginning to unravel the numerous transactions which may be avoidable and recoverable  
15 for the benefit of creditors. Among the possible assets to be recovered are the millions of  
16 dollars of settlement proceeds which the Debtor may have transferred to Erika. The  
17 Trustee’s Special Litigation Counsel (“SLC”) has already corroborated that settlement  
18 funds were diverted to Erika. The SLC for the Trustee has already confirmed that the  
19 Debtor has admitted in numerous filed tax documents that Erika’s related companies  
20 have received over \$20,000,000 according to the tax documents spanning multiple years.  
21 Erika has created a new company AFTER the news broke of this scandal which appears  
22 to simply be a successor company. Erika has multiple financial accounts and the  
23 Debtor’s books show Erika owes large receivables to the Debtor. Erika has refused to  
24 provide access to her management company, her CPA which also houses her  
25 management company, any books and records of EJ Global or any of her affiliated  
26 companies. As each day goes by, Erika has been publicly dissipating community assets  
27 by selling her clothes on public websites, flaunting large jewels on social media and on  
28 television, and has done nothing to assist in return structured firm payments being made

1 to her instead of the firm by the California lottery, notwithstanding she was contacted  
2 through counsel over twelve days ago.

3                   Moreover, to further hide assets, she has created a successor company  
4 using the same CPA and management company.

5                   Michael J. Ullman, the target of this motion, is the agent of process for  
6 Pretty Mess Inc., the successor company referenced above. Erika is using his business  
7 address for her own corporate address. This creates a potential conflict but more  
8 importantly, he has control of all of her business records. Her office is at her business  
9 manager and CPA's office, on Sunset Blvd.. The entity was created on February 23,  
10 2021, in the middle of this bankruptcy.

11                  At every turn, Erika has used the glam to continue to aid and abet this sham  
12 transactions that have been occurring with respect to large transfers of assets from the  
13 Debtor to Erika. Moreover, the Trustee has received zero cooperation from Erika which  
14 is constant with someone hiding assets.

15                  To the extent Erika has spent the \$20,000,000 plus that is showed owed to  
16 the Debtor, the SLC will bring an action for a money judgment for any Debtor funds  
17 received then spent.

18                  On November 3, 2020, Erika filed for divorce in the Los Angeles Superior  
19 Court, Case Number: 20STFL11050, entitled GIRARDI, ERIKA VS GIRARDI, THOMAS  
20 VINCENT. The case is stayed pending the personal bankruptcy of Thomas Girardi and  
21 his conservatorship. Thomas Girardi's attorney is Michael Abrams. Erika Girardi's family  
22 law attorney is Larry A. Ginsburg.

23                  This filing was done before the involuntary bankruptcy. There are  
24 communications with counsel for Erika, financial statements, discloses, and non-  
25 privileged documents that are provided to divorce counsel.

26                  Furthermore, Michael J. Ullman was paid for his services. The incoming  
27 wire or check payments will provide accounts. How those accounts were capitalized and  
28 who paid her legal fees will provide valuable information to recover assets. It will also

1 potentially identify any aiders and abettors assisting Erika in hiding the Debtor's assets.

2 Payments to an attorney are not privileged nor are Harris Ullman's financial records.

3                   In order to assist her in the performance of her statutory duties, on April 26,  
4 2021, the Trustee filed an application seeking to employ the Law Offices of Ronald  
5 Richards & Associates, APC ("Richards APC") as her special litigation counsel to  
6 investigate and, if warranted, sue Erika. The Court overruled Erika's objection to the  
7 Trustee's application, and an order authorizing the employment of Richards APC was  
8 entered on June 10, 2021. Not surprisingly, it was only Erika, a non-creditor who  
9 objected to the appointment.

10                   On June 10, 2021, the SLC sent a demand to Erika's attorney demanding  
11 repayment of a Girardi Keese fee that was improperly assigned to Erika. Erika has  
12 received for years this improper assignment of the Debtor's attorney fee portion arising  
13 from a client settlement instead of the money going to the firm. The irrefutable evidence  
14 was provided to Erika's counsel which included a notarized form signed by Erika and  
15 other irrefutable evidence including a court order. Despite numerous communications  
16 asking Erika's counsel to confirm receipt of the demand, no response or acknowledgment  
17 was provided. Twelve days have passed, and this detailed letter remained unanswered.

18                   On June 15, 2021, Erika's attorneys filed a motion to withdraw alleging a  
19 breakdown in the relationship which suggests of a loss of client control.

20                   On June 15, 2021, Thomas Girardi's trustee filed a motion seeking relief  
21 from stay to pursue a third party state debtor's exam against Erika.

22                   On June 17, 2021, Erika's attorneys withdrew their motion to withdraw as  
23 counsel.

24                   Due to the mounting legal matters, the SLC is concerned that absent the  
25 investigation occurring rapidly, Erika may further dissipate the Debtor's assets. The  
26 necessity to trace her money and investigate the receipt of funds, her purchases  
27 including the bling and the glam, (diamonds and high expenditures of beauty  
28 maintenance, etc.) has become more heightened by these recent events. Erika has

1 repeatedly referenced a lack of any concern for her expenditures and lifestyle in the face  
2 of a \$50,000,000 plus loss and unaccounted funds from his husbands law firm and their  
3 personal joint financial estate. As recently as yesterday, she callously sent out on social  
4 medial her bewilderment why people would continue to be upset at her displays of wealth  
5 (glam) while at a gas station, notwithstanding this money could be the Debtor's and  
6 clients of the Debtor's settlement proceeds, as well as other lenders and attorneys who  
7 have been cheated out of their money.

8 To determine if funds Erika used to pay Ullman Accountancy Corp and  
9 Michael J. Ullman ("Ullman"), her accountants and business manager, with funds that  
10 were fraudulently procured from the Debtor, it is necessary for Ullman to produce key  
11 financial documents and be subject to testimony under oath. Furthermore, Ullman is the  
12 true insider as they manage all of her money and businesses. Specifically, the Trustee's  
13 investigation already has uncovered transfers of assets to Erika that purportedly belong  
14 to the Debtor. This Rule 2004 examination seeks financial records from a third party who  
15 handles all of Erika's finances for her various companies, uses its business address for  
16 financial and corporate records, and has the most knowledge of deposits and cash flow  
17 of Erika. He will also have communications with her attorneys and with Erika about  
18 financial transactions and the movement of money. There is no privilege associated with  
19 the requested documents as they are financial records Ullman received from Erika,  
20 manages for Erika, or receives from Erika's banks. Also, all the financial statements her  
21 prepares for Erika or his accountant notes for Erika are not privileged. All the checks  
22 and wires he initiates for Erika or receives or initiates for Erika are not privileged.

23 As noted, since there is no pending adversary proceeding between the  
24 Trustee and Ullman, Rule 2004 is the proper vehicle for the Trustee to obtain the  
25 necessary financial records.

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**THE COURT SHOULD ORDER ULLMAN TO PRODUCE THE REQUESTED  
DOCUMENTS AND ATTEND AN ORAL EXAMINATION  
PURSUANT TO RULE 2004 OF THE FEDERAL RULES  
OF BANKRUPTCY PROCEDURE**

Rule 2004 provides that “[o]n motion of any party in interest, the court may order the examination of any entity.” Fed. R. Bank. P. 2004(a). The scope of the examination may relate to “the acts, conduct, or property or to the liabilities and financial condition of the debtor, or to any matter which may affect the administration of the debtor’s estate, or to the debtor’s right to a discharge,” as well as matters regarding “the operation of the Debtor’s business, the source of any money acquired or to be acquired by the Debtor for purposes of consummating a plan and the consideration give or offered therefor, and other matters relevant to the case and the formulation of a plan.” Fed. R. Bank. P. 2004(b). Thus, the purpose of the examination is to “view the condition and whereabouts of the bankrupt’s estate.” Keene Corp. v. Johns-Manville Corp. (In re Johns-Manville), 42 B.R. 362, 364 (Bankr. S.D.N.Y. 1984). Furthermore, Rule 2004 also provides for an order requiring the production of documents in connection with the Rule 2004 examination. Fed. R. Bank. P. 2004(c).

19 Courts routinely permit a wide range of inquiry pursuant to Rule 2004. See  
20 In re Drexel Burnham Lambert Group, Inc., 123 B.R. 702, 711 (Bankr. S.D.N.Y. 1991)  
21 (scope of a Rule 2004 examination is very broad, broader even than discovery under the  
22 Federal Rules of Civil Procedure); In re Table Talk, Inc., 51 B.R. 143, 145 (Bankr. D.  
23 Mass. 1985) (courts uniformly recognize that the scope of a Rule 2004 examination is  
24 “unfettered and broad”); In re Mittco, Inc., 44 B.R. 35, 36 (Bankr. E.D. Wis. 1984) (“The  
25 scope of inquiry under Bankruptcy Rule 2004 is very broad. Great latitude of inquiry is  
26 ordinarily permitted.”). As the bankruptcy court explained in In re Mantolesky, 14 B.R.  
27 973 (Bankr. D. Mass. 1981):

Rule 205 [now Rule 2004] provides all interested parties a mechanism for the investigation and reconstruction of the debtor's affairs. That mechanism may cut a broad swath through the debtor's affairs, those associated with him, and those who might have had business dealings with him.

Further, those persons who might have been closely connected with the debtor in his business arrangements, or who even participated in them, will most likely be exposed to the most extensive inquiry.

10 | Id., at 976.

11 In short, under the broad scope of Rule 2004(b), an examination of the  
12 debtor, or third parties with relevant information regarding assets of the estate, is  
13 inquisitorial in nature, and consequently the field of inquiry is wide. Within the limitations  
14 prescribed, any question is permissible which seeks to ascertain facts concerning the  
15 debtor's conduct, property, and financial affairs. An examination pursuant to Rule 2004  
16 may therefore "cut a broad swath through the debtor's affairs." Johns-Manville, 42 B.R.  
17 at 364.

18                   Relative to this case, the Trustee seeks documents from Ullman regarding  
19 the source of funds used to pay the attorney fee and retainer payments for Erika's  
20 counsel, as well as other financial documents which may be relevant to the Trustee's  
21 investigation. The Trustee seeks to discover the identity of the sources of payments  
22 made to Ullman to determine, among other things, whether the funds can be traced to the  
23 Debtor, or were funds fraudulently procured from the Debtor. Emails and other  
24 communications to Erika, her attorneys, and others, are important for the SLC's  
25 investigation.

26 Since the requested document production cannot proceed under Rules  
27 7034 or 9014 of the Federal Rules of Bankruptcy Procedure - since no adversary  
28 proceeding or contested matter has been commenced with respect to the specific issues

1 and transactions Creditors wish to investigate through these requests - the requested  
2 document production and examination is appropriate under Rule 2004.

3 **IV.**

4 **PLACE OF RESIDENCE AND/OR EMPLOYMENT OF EXAMINEE**

5 The Trustee is informed that the principal business address of Ullman  
6 Accountancy Corp is 9200 Sunset Blvd. Suite 600, West Hollywood, CA 90069.

7 (This information is being provided pursuant to Local Bankruptcy Rule  
8 2004-1).

9 **V.**

10 **MEET AND CONFER**

11 The Trustee SLC contacted Michael Ullman's office on June 23, 2021. He  
12 spoke with Mr. Ullman's assistant Kathleen P. (Last name omitted for privacy). She  
13 acknowledged receipt of the meet and confer email confirming that Erika's accountant  
14 would want a court order to release her documents. SLC followed up and requested an  
15 acknowledgement of the position set forth in the email. SLC called a third time and sent a  
16 second email. Suddenly, Mr. Ullman had to leave the office for an "emergency" meeting.  
17 SLC advised he could not force participation in a meet and confer. SLC believes he has  
18 attempted to satisfy this requirement in good faith. See declaration of Ronald Richards,  
19 affixed hereto.

20 **VI.**

21 **LOCATION OF EXAMINATION**

22 Rule 2004(c) provides that "[t]he attendance of an entity for examination  
23 and for the production of documents, whether the examination is to be conducted within  
24 or without the district in which the case is pending, may be compelled as provided in Rule  
25 9016 for the attendance of a witness at a hearing or trial." Rule 9016 of the Federal  
26 Rules of Bankruptcy Procedure states that Rule 45 of the Federal Rules of Civil  
27 Procedure applies in bankruptcy cases. Rule 45(c)(2) provides that a subpoenaed party  
28 may be required to attend at any place within 100 miles from the place where that person

1 resides, is employed, or transacts business in person. Here, the Trustee proposes to  
2 conduct the examination of Ullman via “zoom.com” such that there will be no inconvenience  
3 to Ullman. The examination will be recorded by audio, audiovisual, and/or stenographic  
4 means. If the examination is not completed on the date set forth herein, it will continue  
5 from business day to business day, Sundays and holidays excepted, until completed  
6 unless otherwise agreed by the parties.

7 **VII.**

8 **CONCLUSION**

9 The requested production of documents and oral examination are central to  
10 the Trustee’s independent investigation into the Debtor’s assets and liabilities which will  
11 assist the Trustee in her administration of the estate. Accordingly, the Trustee requests  
12 that the Court order Ullman to produce documents responsive to the requests in Exhibit  
13 “A” on or before July 21, 2022. In light of anticipated continuation of office closures  
14 related to the COVID-19 pandemic, the Trustee requests that the documents be  
15 produced electronically by email to [ron@ronaldrichards.com](mailto:ron@ronaldrichards.com) and  
16 [morani@ronaldrichards.com](mailto:morani@ronaldrichards.com). Due to the limited scope of the Motion, the Trustee  
17 anticipates that further document production(s) could be necessary and the Trustee,  
18 therefore, reserve the right to serve additional document requests.

19 In addition, the Trustee requests that the Court order Michael J. Ullman and  
20 the Custodian of Records for ULLMAN ACCOUNTANCY CORP to appear for  
21 examination, under oath, on July 23, 2021, at 1:00 p.m., Pacific Time. In light of  
22 anticipated continuation of office closures related to the COVID-19 pandemic, the  
23 examination shall take place via “zoom.com” and the instructions for the zoom meeting  
24 shall be provided to Ullman no later than July 21, 2021, unless the Trustee, in her sole  
25 discretion, designates another means of electronic examination.

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1 DATED: June 23, 2021

Law Offices of Ronald Richards & Associates, APC

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By: /s/ Ronald Richards

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Ronald Richards

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Special Litigation Counsel for Elissa D. Miller,  
Chapter 7 Trustee

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## DECLARATION OF RONALD RICHARDS

I, Ronald Richards, declare:

3           1. I am an individual over the age of eighteen, a principal of Law Offices  
4 of Ronald Richards & Associates, APC, and am duly admitted to practice before this  
5 Court. I am one of the attorneys principally responsible for the representation of Elissa D.  
6 Miller (the "Trustee"), the duly appointed, qualified, and acting chapter 7 trustee for the  
7 estate of the debtor Girardi Keese (the "Debtor") in this case. I have personal knowledge  
8 of the facts set forth below, and if called as a witness, could and would competently  
9 testify thereto under oath.

10                   2. I make this declaration in support of the "Notice of Motion and Motion  
11 for Order Requiring Production of Documents Pursuant to Rule 2004 of the Federal Rules  
12 of Bankruptcy Procedure; Memorandum of Points and Authorities; Declaration of Ronald  
13 Richards in Support Thereof" (the "Motion"), pursuant to which the Trustee requests,  
14 pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure and Local  
15 Bankruptcy Rule 2004-1, an order directing ULLMAN ACCOUNTANCY CORP and  
16 Michael J. Ullman ("Ullman") to produce the documents identified in Exhibit "A" attached  
17 hereto (the "Requested Documents") by no later than July 21, 2021, and that Ullman  
18 appear for examination, under oath, and that such examination take place on July 23,  
19 2021, at 1:00 p.m., Pacific Time.

[Remainder of page intentionally left blank]

13 I declare under penalty of perjury under the laws of the United States of  
14 America that the foregoing is true and correct.

15 Executed this 23rd day of June, 2021.

17 /s/ Ronald Richards  
Ronald Richards

1 **EXHIBIT A**  
2 **INSTRUCTIONS**

3       1. You are instructed to produce the Requested Documents (as defined  
4 and described below) that are in your possession, custody or control, including, but not  
5 limited to, Requested Documents in the possession of your attorneys, accountants,  
6 bookkeepers, agents, and/or representatives. You are further instructed to produce the  
7 Requested Documents as they are kept in the usual course of business. In addition,  
8 Requested Documents are to be produced in their entirety; redacted Requested  
9 Documents will not constitute compliance with this request.

10       2. If you contend that the contents of a Requested Document are  
11 protected from disclosure because of privilege or the work-product doctrine, you must  
12 supply a description of that Requested Document by providing the following information:

13           A. Each privilege or doctrine which you contend protects the  
14 contents of that Requested Document from disclosure;

15           B. Each fact upon which you rely to support your claim of  
16 privilege;

17           C. The type of Requested Document (e.g., letter, memorandum,  
18 telegram, facsimile transmission, e-mail, computer database, notes, memorandum of  
19 telephone conversation, etc.);

20           D. The date of the Requested Document or if it bears no date,  
21 the date on which it was prepared;

22           E. The name of each author of the Requested Document;

23           F. The name of each person to whom the Requested Document  
24 was directed;

25           G. The name of each person who received or reviewed the  
26 Requested Document or to whom the Requested Document or a copy of it was supplied;  
27 and

28           H. The general subject matter of the Requested Document.

1                   3.        In the event that any Requested Document described below has  
2 been destroyed, discarded, or otherwise disposed of (a “Disposal”), each such  
3 Requested Document is to be identified as completely as possible, including, without  
4 limitation, the following information:

10 C. The name of each author of the Requested Document;

11 D. The name of each person to whom the Requested Document  
12 was directed;

16 F. The general subject matter of the Requested Document;

**17** G. The date of Disposal;

## 18 H. The manner of Disposal;

## 19 I. The reasons for the Disp

20 J. The name of the person who

**21** K. The name of the person who disposed of the Request

**22** | Document;

23 L. The name of the custodian of the Requested Document at the  
24 time of the Disposal.

25 4. These requests are not limited as to time period unless so stated.

## **DEFINITIONS**

27 The following definitions apply herein:

28 A. The term "Case" shall mean that bankruptcy case styled In re Girardi

1 Keese, presently pending in the United States Bankruptcy Court, Central District of  
2 California, Los Angeles Division, bearing Case No. 2:20-bk-21022-BR commenced on  
3 December 18, 2020.

4                   B.       The term "Claim" shall have the meaning ascribed to it in 11 U.S.C. §  
5 101(5).

6                   C.       The terms "Trustee" or "Miller" shall mean Elissa D. Miller, the duly  
7 appointed, qualified, and acting chapter 7 trustee for the Debtor's estate.

8                   D.       The term "Creditor" shall have the meaning ascribed to it in 11  
9 U.S.C. § 101(10).

10                  E.       The term "Communications" shall mean any transmission of  
11 information from one person or entity to another by mail, facsimile, electronic mail, text  
12 message, instant messaging, audio recordings, journals, diaries, logs, or calendars,  
13 including (without limitation) any form of memorialization of personal meetings,  
14 conferences, telephone conversations, radio, electronic mail, teleconference, etc.

15                  F.       The term "Debt" shall have the meaning ascribed to it in 11 U.S.C. §  
16 101(12).

17                  G.       The term "Involuntary Petition" shall mean that certain involuntary  
18 chapter 7 petition styled In re Girardi Keese, presently pending in the United States  
19 Bankruptcy Court, Central District of California, Los Angeles Division, bearing Case No.  
20 2:20-bk-21022-BR.

21                  H.       The term "Ullman" shall mean ULLMAN ACCOUNTANCY CORP,  
22 Michael J. Ullman and any of their respective employees, affiliates, representatives,  
23 agents, attorneys, accountants, and all other persons acting or purporting to act on their  
24 behalf.

25                  I.       The term "Erika" shall mean Erika Jayne aka Erika Girardi aka Erika  
26 Chahoy, and any of their respective employees, affiliates, representatives, agents,  
27 attorneys, accountants, and all other persons acting or purporting to act on her behalf.

28                  J.       The term "Petition Date" shall mean December 18, 2020, the date

1 the Involuntary Petition was filed.

2           K.     The terms "and" or "or" or "and/or" shall be construed either  
3 disjunctively or conjunctively or both, as necessary, to bring within the scope of any  
4 request for responses which might otherwise be construed to be outside the scope.

5           L.     The term "Contact Information" shall mean information upon which a  
6 person or entity may be reached via mail, telephone, facsimile, e-mail or in person or any  
7 other medium that is reasonable, and shall include without limitation, present and last  
8 known address(es), phone number(s), facsimile number(s), and e-mail address(es).

9           M.    The terms "Document" or "Documents" shall mean and includes any  
10 medium, including without limitation, writings, drawings, graphs, charts, photographs,  
11 audio and video recordings, computerized records, such as e-mails, microfilm,  
12 microfiche, data compilations, upon which intelligence or information can be recorded,  
13 maintained or retrieved, including without limitation, the original or a copy thereof,  
14 regardless of the origin and location, of any writing or recording of any type or  
15 description, however produced or reproduced, which is in your or your representatives'  
16 possession, custody or control, or to which you have or had access, or of which you have  
17 knowledge or which you have a right or privilege to examine upon request or demand,  
18 and includes any and all writings and recordings as the term is used in Rule 1001(1) of  
19 the Federal Rules of Evidence and includes the original (or a copy if the original is not  
20 available) and any nonidentical copies (whether different from the original because of  
21 notes made on the copy or otherwise).

22           N.    The terms "relate to", "refer to", "evidence", "concern", "pertain to"  
23 and "pertaining to" shall mean mentioning, discussing, including, summarizing,  
24 describing, reflecting, containing, referring to, relating to, depicting, connected with,  
25 embodying, evidencing, constituting, concerning, reporting, purporting or involving an act,  
26 occurrence, event, transaction, fact, thing, or course of dealing.

27           O.    The term "you" or "your" shall mean ULLMAN ACCOUNTANCY  
28 CORP, Michael J. Ullman, both collectively, and Michael J. Ullman individually, and any

1 of their respective employees, affiliates, representatives, agents, attorneys, accountants,  
2 and all other persons acting or purporting to act on their behalf. The term "Ullman" shall  
3 be used interchangeably with the terms "you" or "your".

4 P. The singular form of a word should be interpreted as plural and the  
5 plural should be interpreted as singular to give the word or words the broadest possible  
6 meaning.

7 Q. The masculine gender of any word shall be construed to include the  
8 masculine, feminine, and neuter gender.

9 **REQUESTED DOCUMENTS**

10 1. All communications between you and Erika, or where a third party  
11 was on the email chain or group text message. including, but not limited to, emails and  
12 text messages.

13 2. All financial statements, pleadings, or non-privileged portions of the  
14 legal family law file for Erika.

15 3. All communications between you and attorney Michael Abrams or  
16 Thomas Girardi.

17 4. All communications between Ullman and Larry A. Ginsburg or Harris  
18 Ginsburg LLP or any its employees.

19 5. All documents evidencing any payments you received from Erika, or  
20 any third party on Erika's behalf, including, without limitation, copies of checks, cashier's  
21 checks, money orders, wire transfers, or other forms of payment.

22 6. All receipts documenting any form of payment you received from  
23 Erika, or any third party on Erika's behalf.

24 7. All documents from any credit reporting agency regarding Erika.

25 8. All checks, cashier's checks, money orders, wire transfers, or other  
26 forms of payment you received from Erika, or any third party on Erika's behalf, meant to  
27 serve as a retainer or payment of a Ullman invoice including any professionals retained  
28 by Ullman.

1           10. All financial documents and/or financial statements you received  
2 from Erika, or any third party on Erika's behalf, or you prepared for Erika.

3           11. All communications between Ullman Accountancy Corp., Michael  
4 Ullman, Allen Ullman, or Platinum Financial Management Inc. and any lender, financial  
5 institution, or Bravo TV on behalf of Erika.

6           12. All bank statements you have in your possession, custody or control  
7 for the following banks for Pretty Mess Inc., EJ Global, LLC, Erika Chahoy, Erika Girardi,  
8 Erika Jayne, any company that you manager at Erika's direction.

9           13. All canceled checks, wire receipts, you have in your possession,  
10 custody, or control for Pretty Mess Inc., EJ Global, LLC, Erika Chahoy, Erika Girardi,  
11 Erika Jayne, any company that you manager at Erika's direction.

12           14. All invoices you have provided Erika for any services you have  
13 provided.

14           15. All communications you have received for Pretty Mess Inc., EJ  
15 Global, LLC, Erika Chahoy, Erika Girardi, Erika Jayne, any company that you manager at  
16 Erika's direction, from the Internal Revenue Service, Franchise Tax Board, or any other  
17 taxing agency.

18           16. All payments received from BravoTV, Real Housewives of Beverly  
19 Hills franchise, or NBC.

20           17. All payments Erika has made to any employee, assistant, make up  
21 artist, hair dress on her behalf including but not limited to any member of her GLAM  
22 squad.

23           18. All loan documents, financial statements, and payments made for the  
24 November 3, 2020 (same date as divorce filing) auto purchase from Desert European  
25 Motors.

26           19. Copies of all titles or leases of any vehicle driven by Erika including  
27 but not limited to her JP Morgan chase bank loan.

28

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
PO Box 11480  
Beverly Hills, CA 90213

A true and correct copy of the foregoing document entitled (*specify*): \_\_\_\_\_  
Notice of Motion and Motion for a 2004 examination for Ullman Accountancy Corp, Michael Ullman

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) June 23, 2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) June 23, 2021, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Michael Ullman  
Ullman Accountancy Corp  
9200 Sunset Blvd. Suite 600  
West Hollywood, CA 90069  
Via email pdf to  
[michael@pfmi.com](mailto:michael@pfmi.com) with copy to [katherine.petrie@pfmi.com](mailto:katherine.petrie@pfmi.com).

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 23, 2021      Ronald Richards  
Date                    Printed Name

/s Ronald Richards  
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

**2:20-bk-21022-BR Notice will be electronically mailed to:**

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